

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

ALEX DEMOUCHE, HELEN SONNIER,
AND SHAQUR STEVENSON

PLAINTIFFS

v.

CIVIL ACTION NO. 1:22cv155 HSO-RHWR

MELTON TRUCK LINES, INC.
AND JERQUEZ HUGHEY

DEFENDANTS

COMPLAINT

NOW INTO COURT, through undersigned counsel, comes plaintiffs, **ALEX DEMOUCHE, HELEN SONNIER, and SHAQUR STEVENSON**, citizens of the full age of majority, domiciled and residing in the Parish of Lafayette, State of Louisiana, and for their complaint in this civil action for damages against the defendants, respectfully represents to this Honorable Court as follows:

PARTIES, JURISDICTION, & VENUE

I.

Jurisdiction for these claims before this Honorable Court is based upon 28 U.S.C. § 1332.

II.

Venue for these claims is proper in accordance with Title 28 U.S.C. § 1391(b)(2).

III.

Made defendant herein is **MELTON TRUCK LINES, INC** (“**MELTON TRUCK**”), upon information and belief, a corporation organized and existing under the laws of the State of Oklahoma and may be served with process by serving its principal office at 808 N 161st East Avenue, Tulsa, Oklahoma 74116.

IV.

Made defendant herein is **JERQUEZ HUGHEY**, upon information and belief, an individual of the full age of majority and domiciled in the County of Davidson, State of Tennessee, may be served with process at his residence located at 256 Stewarts Ferry Pike, Apt. 53, Nashville, Tennessee 37214.

FACTUAL ALLEGATIONS

V.

On or about March 20, 2022, at approximately 2:23 p.m., plaintiff, Alex Demouchet was driving his 2007 Chevrolet Pickup truck, traveling eastbound on I-10 in Harrison, Mississippi with guest passengers, Helen Sonnier and Shaqur Stevenson, and was lawfully traveling in the left lane of travel, when suddenly and without warning, the front of their vehicle was violently struck by the trailer attached to a 2020 Kenworth 18-wheeler, owned by defendant, Melton Truck Lines, Inc. and operated by defendant, Jerquez Hughey.

VI.

The aforesaid collision occurred through no fault of the plaintiff Alex Demouchet; rather, the collision was caused solely by the fault and negligence of the defendant, **JERQUEZ HUGHEY**, in the following non-exclusive particulars:

- a. Swerving into plaintiff's vehicle's lane of travel;
- b. Striking the front of the 2007 Chevrolet Pickup truck;
- c. Operating one's vehicle at an excessive rate of speed;
- d. Inattention;
- e. Failure to keep a proper lookout for other traffic;
- f. Failure to maintain the proper degree of control of the vehicle;

- g. Violation of applicable local, state and federal highway laws and regulations regarding the operation of motor vehicles; and,
- h. Any and all other acts of negligence, recklessness and fault as will be shown at the trial of this matter.

VII.

Upon information and belief, and therefore alleged, defendant, **JERQUEZ HUGHEY**, was an employee of defendant, **MELTON TRUCK**, at the time of the subject accident, and was in the course and scope of his employment, thus rendering **MELTON TRUCK** liable for all damages and losses suffered by petitioners herein as a result of **JERQUEZ HUGHEY'S** negligence under the theory of *respondeat superior*.

VIII.

As a result of the collision sued on herein, plaintiff, **ALEX DEMOUCHET**, suffered severe injuries, including but not limited to injuries to his cervical spine and lumbar spine, which injuries have caused and will cause plaintiff, **ALEX DEMOUCHET**, residual disability, disfigurement and scarring, past and future pain and suffering, past and future mental anguish and distress, past and future loss of enjoyment of life, past and future medical expenses, loss of past and future earnings or income earning capacity, and property damages to his 2007 Chevrolet pickup truck in the amount of \$5,862.43.

IX.

As a result of the collision sued on herein, plaintiff, **HELEN SONNIER**, suffered severe injuries, including but not limited to injuries to her cervical spine and lumbar spine, and right shoulder, which injuries have caused and will cause plaintiff, **HELEN SONNIER**, residual

disability, disfigurement and scarring, past and future pain and suffering, past and future mental anguish and distress, past and future loss of enjoyment of life, past and future medical expenses, and loss of past and future earnings or income earning capacity.

X.

As a result of the collision sued on herein, plaintiff, **SHAQUR STEVENSON**, suffered severe injuries, including but not limited to injuries to his cervical spine and lumbar spine, which injuries have caused and will cause plaintiff, **SHAQUR STEVENSON**, residual disability, disfigurement and scarring, past and future pain and suffering, past and future mental anguish and distress, past and future loss of enjoyment of life, past and future medical expenses, and loss of past and future earnings or income earning capacity.

XI.

Plaintiffs accordingly aver entitlement to recover from defendants, damages as may be reasonable in the premises, in accordance with the law and the evidence.

XII.

DEMAND FOR JURY TRIAL

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, plaintiffs hereby demand a trial by jury in this action of all issues so triable.

WHEREFORE, plaintiffs, **ALEX DEMOUCHET, HELEN SONNIER, and SHAQUR STEVENSON**, pray that after due proceedings are had, there be judgment in favor of plaintiffs, **ALEX DEMOUCHET, HELEN SONNIER, and SHAQUR STEVENSON**, and against defendants, **MELTON TRUCK LINES, INC. and JERQUEZ HUGHEY** for all compensatory damages supported by the law and the evidence, granting plaintiffs legal interest on all sums awarded from date of judicial demand until paid and casting defendants with all costs of these

proceedings including legal interest thereon.

By Attorney:

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